

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF IOWA

In re:) Chapter 11
)
QHC FACILITIES, et al¹) Case No. 16-01643-als11
) Jointly Administered
Debtors and Debtors in)
Possession) **DEBTORS' MOTION FOR**
) **AUTHORITY TO FILE**
) **DECLARATION OF LANETT**
) **POWERS UNDER SEAL**
)
)

COMES NOW QHC Facilities, and its affiliates in the below referenced cases (collectively, the “Debtors” or “QHC”), Debtors and Debtors in Possession in the above-titled Chapter 11 case, by and through their duly-employed General Reorganization Counsel, Jeffrey D. Goetz, Esq. and Krystal R. Mikkilineni, Esq., of the law firm of Bradshaw, Fowler, Proctor & Fairgrave, P.C., and respectfully files the instant Motion for Authority to File the Declaration of Lanett Powers Under Seal, and would show this Honorable Court as follows:

1. On December 29, 2021, the Debtors filed voluntary petitions under chapter 11 of the United States Code (the “Bankruptcy Code”) (Docket No. 1) (the “Petition Date”). The Debtors filed motions to jointly administer the cases pursuant to Bankruptcy Rule 1015(b), and the Court entered an Order authorizing joint administration on January 19, 2022 (Docket No. 66).

¹ The Jointly Administered Debtors in this proceeding are *In re QHC Management, LLC* (Case No. 21-01644-als11), *In re QHC Mitchellville, LLC* (Case No. 21-01645-als11), *In re QHC Winterset North, LLC* (Case No. 21-01646-als11), *In re QHC Madison Square, LLC* (Case No. 21-01647-als11), *In re QHC Fort Dodge Villa, LLC* (Case No. 21-01648-als11), *In re QHC Crestridge, LLC* (Case No. 21-01649-als11), *In re QHC Crestview Acres Inc.* (Case No. 21-01650-als11), *In re QHC Humboldt North, LLC* (Case No. 21-01651-als11), *In re QHC Humboldt South, LLC* (Case No. 21-01652-als11) and *In re QHC Villa Cottages, LLC* (Case No. 21-01653-als11).

2. Pursuant to Bankruptcy Code sections 1107 and 1108, since the Petition Date, the Debtors have continued in possession of their property and operation of their businesses as Debtors in Possession.

3. On January 11, 2022, the United States Trustee filed a Motion for the Appointment of a Chapter 11 Trustee (Docket No. 41) ("the UST Motion").

4. On January 12, 2022, the Debtors filed an Objection to UST's Motion for the Appointment of a Chapter 11 Trustee (Docket No. 44) (the Objection").

5. The Debtors have prepared a Declaration by Lanett Powers, RN, Nurse Consultant for QHC (the "Declaration") in opposition of the UST Motion.

6. This Declaration contains sensitive matters and confidential information, and it would be in the best interests of creditors and the Bankruptcy Estate if the Debtors are granted authority to file the said Declaration under seal.

WHEREFORE, the Debtors respectfully request that the Court grant the instant Motion for authority to file the Declaration and the exhibits thereto under seal, and for such other and further relief as may be just and equitable under the circumstances.

Date: January 24, 2022

/s/ Krystal R. Mikkilineni

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CERTIFICATE OF SERVICE:

This document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing.

/s/ Barbara Warner